Supreme Court, U.S.
FILED
OCT 7 2001
CLERK

(3)

No. 01-258

In The

Supreme Court of the United States

Yvonne Liebel

Petitioner,

v.

Eugene Grant, Esq.; Robert Nagro; Richard Solomon; Ridgefield Bank; Weil, Gotshal and Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoeing, Esq.; David Stone, Esq.; Ira Millstein, Esq.; Marvin Jacob, Esq.; Reynolds and Rowella, LLP.; PricewaterhouseCoopers, LLP/Kesselman & Kesselman, LLP.;

Respondents.

On Petition For Writ Of Certiorari
To State Of Connecticut Appellate Court

PETITIONER'S SUPPLEMENTAL BRIEF TO PETITION FOR WRIT OF CERTIORARI

Yvonne Liebel, **Pro Se**
8913 Olimpic Blvd. Suite 101, Beverly Hills, CA 90211
e-mail: yliebel @ aol.com
Tel: (310) 657-2771 Cell: (310) 435-0769 Fax: (310) 657-2731

32 pp

QUESTION PRESENTED

Do the recent actions of the Connecticut Superior Court, through its Complex Litigation Docket, continue to violate the Petitioner's Due Process rights?

Question is addressing continued violations of Petitioner's constitutional rights to Due Process and Equal Protection Of The Laws under the
Fourteenth Amendment of The United States Constitution

This litigant's life and her family's are at risk

PARTIES TO THE PROCEEDINGS

Plaintiffs /Petitioners

Yvonne Liebel, Petitioner, is an individual and has no corporate affiliation; **The Alliance Foundation, Inc.**, a Connecticut 501 (c)(3) non-stock corporation; **Alliance Capital, Inc.**, a Connecticut corporation with no parent or publicly held company; **General Homes, Inc.** a Connecticut corporation with no parent or publicly held company; **Alliance International Development Corp.**, a Connecticut corporation with no parent or publicly held company; **DTL-USA, Inc.**, a Connecticut Corporation with no parent or publicly held company.

Defendants/Respondents

Eugene Grant, Esq., an individual and has no corporate affiliation ; **Robert Nagro,** an individual and has no corporate affiliation; **Richard Solomon,** an individual and has no corporate affiliation; **Ridgefield Bank**, a Connecticut corporation, a commercial bank with no parent or publicly held company; **Weil, Gotshal and Manges, LLP,** a New York limited Liability Partnership; **Mark Hoeing, Esq.**, an individual and has no corporate affiliation; **David Stone, Esq.**, an individual and has no corporate affiliation; **Bridge to Brotherhood, Inc.**, a New York 501(c)(3) non stock corporation; **Ira Millstein, Esq.**, an individual and has no corporate affiliation; **Marvin Jacob, Esq.**, an individual and has no corporate affiliation; **Reynolds and Rowella, LLP.** a Connecticut , Limited Liability Partnership; **PricewaterhouseCoopers, LLP/Kesselman & Kesselman,** a Delaware Limited Liability Partnership.

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BASIS FOR JURISDICTION

This Supplemental Brief is in response to new intervening matters not available at the time of the Petitioner's filing of the Petition for Writ of Certiorari on July 30, 2001. This Brief is filed in accordance with Rule 15.8 of the Supreme Court of the United States, under which the jurisdiction of this Court is invoked.

STATEMENT OF NEW FACTS

1. Since ***August 26, 2001***, Petitioner has been and continues to be for the next 45-60 days the primary care giver to her father in California who since the filing of the Writ on ***July 30, 2001*** suffered a second stroke and a heart attack. The following is a temporary change of address for the next 60 days:
Yvonne Liebel c/o DHA Development, Inc.
8913 Olimpic Blvd, Suite 101, Beverly Hills, CA 90211
Tel: (310) 657-2771 Cell: (310) 435-0769 Fax: (310) 657-2731

2. On ***October 11, 2001***, granted a 30 day extension, a Brief in Opposition was filed by Attorney of Record for respondents: Weil, Gotshal & Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoenig; David Stone; Ira Millstein; and Marvin Jacob;

3. Due to Petitioner's situation and lack of legal counsel, on ***October 22, 2001*** (due date to file a Reply Brief) Petitioner mailed via U.S. Express Mail, an Application for Extension of Time till ***December 10, 2001*** to file the Reply Brief (App. A). Petitioner did not receive the Court's reply but learned of a November 9, 2001 conference.

4. On ***October 23, 2001***, Petitioner was examined and a biopsy was taken for an unusual thyroid cystic lesion possibly due to an extended exposure to the water at her residence (to date Petitioner's residence can not be occupied more than on a very limited basis until environmental problems are resolved (Page 18 of Petition)).

5. On ***October 23, 2001,*** Petitioner received a message on her cell phone at (310) 435-0769 at approx. 2:45PM Pacific Time from Ms. Brenda Hamilton, Esq., Court Officer for Hon. Judge Michael R. Sheldon at the Waterbury Superior Court, Complex Litigation Docket in Waterbury, Connecticut.

6. On ***October 24, 2001,*** Petitioner returned Ms. Hamilton's call only to find out that five weeks prior, without her knowledge or consent, her case(s) were transferred from the Complex Litigation Docket in Stamford, Connecticut to the Complex Litigation Docket in Waterbury, Connecticut. According to Ms. Hamilton the Judge at the Stamford Complex Litigation Docket recused from these cases due to conflict-of-interest with one of the Defendants' law firms (Ms. Hamilton did not know which law firm) and was transferred to another district (also unknown to Ms. Hamilton). Petitioner was shocked. For the past year, Hon. Judge Tierney was fiercely intent on transferring these cases to his Court and was scheduled to remain in Stamford for an extended term or at least until these cases were concluded. A conflict-of-interest this late in the process; his sudden transfer; and the transfer of the cases to Waterbury Complex Litigation raised more questions than answers. Ms. Hamilton, however, refused to provide Petitioner with any additional information, only that an Initial Status Conference was scheduled for October 29, 2001 at the Waterbury Complex Litigation Docket, Hon. Judge Michael R. Sheldon presiding. Petitioner informed Ms. Hamilton that she was unable to attend the Conference due to her domestic situation; that the corporations had no legal counsel; and that the issues concerning counsel and the transfer of these cases from the Danbury Superior Court in Danbury, Connecticut to <u>any</u> Complex Litigation Docket in the State of Connecticut were pending an appeal to the U.S. Supreme Court. Petitioner also reminded Ms. Hamilton that until the Appeal process was concluded, the Danbury Superior Court had jurisdiction over these cases. Petitioner requested that the Initial Status Conference be delayed until these issues were resolved. Ms. Hamilton promised to convey the message to Hon. Judge Sheldon.

7. On ***October 25, 2001,*** Petitioner called Ms. Rose-anne Rush, Esq. the Court Officer at the Complex Litigation Docket in Stamford to find out about the transfer. Ms. Rush was absent until October 29, 2001. Petitioner also called Attorney Kevin Ahern, who according to Ms. Hamilton, was still listed as attorney for the corporations. Petitioner left a message for Attorney Ahern requesting information.

8. On ***October 26, 2001,*** Petitioner received lab results with regard to the Thyroid Cyst: " Type of cystic lesion cannot be determined as there are only rare poorly preserved follicular cells." Doctor was puzzled by report and ordered a second opinion. Opinion pending.

9. On ***October 26, 2001,*** Petitioner received from Attorney Ahern copies of notices with regard to the transfer. Accordingly, Hon. Judge Chase Rogers replaced Hon. Judge Tierney at the Complex Litigation Docket in Stamford and it was Judge Rogers who recused from these cases. Her recusal provided the basis for the reassignment of these cases to the Chief Administrative Judge of the Civil Division; the cancellation of a Status Conference scheduled for September 12, 2001 at Stamford (App. B); and the subsequent transfer of these cases to the Waterbury Complex Litigation Docket in Waterbury (App. C).

9. On ***October 28, 2001,*** as customary in Connecticut Superior Courts Short Calendar hearings, Petitioner informed Ms. Hamilton, in writing, of her special circumstances in California; the absence of counsel to represent her and the Plaintiff corporations; the pending appeal at the U.S. Supreme Court; and asked Ms. Hamilton to Mark Off Not Ready the scheduled conference (App. D).

10. On ***October 29, 2001,*** although Petitioner pleaded with the Waterbury Complex Litigation Docket in Waterbury to hold off on the Status Conference, Hon. Judge Michael R. Sheldon held the scheduled conference with all opposing counsel present, absent Petitioner(s) and any legal representation for them (App. E). According to Ms. Hamilton, Hon. Judge Sheldon together with

opposing counsel set a litigation schedule. Petitioner was told to expect a 30 page Transcript to be ready on November 6, 2001. At the Conference Hon. Judge Sheldon granted Attorney Kevin Ahern's Motion To Withdraw from representation. Following the conference Attorney Kevin Ahern strongly recommended to Petitioner to immediately obtain new counsel or risk default of cases (App. F).

REASONS FOR GRANTING THE WRIT OF CERTIORARI

The zeal shown by the Connecticut Court System and the Respondents in keeping this case(s) in the Complex Litigation Docket with its vague rules and away from the Connecticut Superior Court where clear cut Connecticut Law is applied, is highly suspect. In an attempt to "fix" and camouflage the outrageous injustice that was done to this Petitioner and the corporations under her care while keeping this case(s) in the Complex Litigation Docket, the Connecticut Court System once again played into the Respondents' powerful hands by transferring the case from the Stamford Court whose conduct since November 15, 2000 clearly demonstrated the adjudication ills of the Complex Litigation Docket (all its rules; decisions; errors and omissions; without exception, were in favor of Defendants and not subject to appeal). It seems the transfer was an attempt to isolate the problem to a single judge at Stamford in an effort to salvage the reputation or existence of this highly criticized Docket, while continuing to subject the Petitioner to its unconstitutional standards and deprive her of her due process rights and the equal protection of the laws.

In addition, when powerful law firms rob their pro-bono clients to serve their own interests (Petition, App. D3, at 26a), confident that those clients couldn't bring a suit against them; Summon their legal Fraternity to protect them against lawsuits even at the cost of violating precious laws; Threaten individual attorneys who braved their peers' pressure, by leaving slashed rabbits on their door step; threaten 'they could never work again in their legal profession'; threaten with sanctions and loss of their license, etc.,

then these powerful law firms have taken the legal system hostage. This Petitioner(s) was a victim of their methods for two and a half years prior to filing the lawsuits and throughout this litigation. In their Brief in Opposition, the Respondents ignored this issue entirely, which has everything to do with their obstruction of justice and the denial of the Petitioner's rights to due process and equal protection of the laws. This is not a State matter as these Respondents would like this Court to believe, but an extreme violation of Federal and Constitutional laws that are subject to this Court's jurisdiction. Their deeds were carefully chronicled in the Petitioner's Third Amended Complaint and supported by necessary exhibits that enabled two Superior Court judges to independently cite them in as Defendants in this litigation. Although the Writ and this Brief were forced to be submitted only with respect to the Petitioner as the corporations "lost" their counsel just prior to the filing of the Writ, the arguments made herein are equally applicable to the Plaintiff corporations that are parties to these proceedings.

CONCLUSION

1.This Petitioner's painful saga with the Complex Litigation Dockets in the State of Connecticut continues to cause significant damage to this case(s) and the only possible relief is a United States Supreme Court decision to return these cases to their original Superior Court in Danbury where proper venue lies and where Connecticut law can provide some shield against the Respondents' actions. This Petitioner prays this Court will grant this transfer.

2.Without the United States Supreme Court's intervention this Petitioner and the corporations under her care will never be able to secure zealous legal counsel to represent their interests, to which they are entitled to under the Constitution of the United States of America, and justice will forever be denied them. This Petitioner prays that this distinguished Court will assist this Petitioner(s) in obtaining such counsel so that justice can be served.

Dated: Beverly Hills, California
November 5, 2001

Respectfully Submitted,

Yvonne Liebel, Pro Se
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Beverly Hills, CA 90211
(310) 657-2771 (310) 435-0769
Fax: (310) 657-2731

APPENDIX A

Yvonne Liebel

8913 Olimpic Blvd, Suite 101,Beverly Hills, CA 90211
Tel: (310) 657-2771 Fax: (310) 657-2731

October 22, 2001

Via: U.S. Express Mail

(202) 479-3024
Mr. Frank Lorson
Chief Deputy Clerk
United States Supreme Court
One First Street – NE
Washington, D.C. 20543

Re: Liebel v. Grant et al
Case No.: 01-258

Dear Mr. Lorson:

With respect to the above matter, any Reply Brief in response to Brief in Opposition filed by Attorney of Record for respondents: Weil, Gotshal & Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoenig; David Stone; Ira Millstein; and Marvin Jacob, on October 11, 2001 is presently due today, ***October 22, 2001.*** Please allow this correspondence to serve as Application for Extension of Time to file a Reply Brief in response to the Brief in Opposition from the present date of October 22, 2001 to ***December 10, 2001.***

The reason for this requested extension of time is tha additional time is necessary in order to allow this Petitioner to try to obtain some legal assistance, complete, finalize and serve a

BEST AVAI

submission to this Court. In addition, Petitioner, who is in pro se with respect to this matter, for the past couple of months has been and continues to be the primary care giver to her father in California who since the filing of the Petition for Writ of Certiorari on July 30, 2001 had suffered a second stroke and a heart attack. With this fragile and limiting situation Petitioner may or may not be able to file the Reply Brief within this time frame. However, Petitioner wishes to obtain this extension in order to make every effort to respond given the misstatements, discrepancies, omissions, innuendos, and the like in the Respondents' Brief in Opposition.

One example of a misstatement is in the footnotes on page 9 of the Respondents' brief. The respondents refer to August 8, 2001 as the date of service of the Petition in which the corporate Plaintiffs are not represented. This date is incorrect.

Correct date is August 13, 2001. The initial Petition was filed and served on July 30, 2001. On August 8, 2001, Petitioner was requested to correct the petition by removing the corporate petitioners. On August 13, 2001, Petitioner submitted the corrected petition and served the appropriate parties. This was stated in the Court's letter of August 14, 2001, copy of which was sent to the respondents. To support this argument please see the attached letter dated August 15, 2001 from the Petitioner to approximately 650 contributors and friends of the Alliance Foundation, Inc. throughout the U.S, Europe and Israel as part of an ongoing update on this litigation (8 pages). Please also see attached a letter from the law firm of Zeldes, Needle & Cooper of Connecticut responding in the negative to providing the Petitioner and the corporations legal counsel (1 page). This was the Petitioner's latest attempt to secure counsel before preparing, filing and serving the Petition for Writ of Certiorari in pro se.

Given that Petitioner must stay in California for at least the next 30-45 days, kindly forward all future communications during this period to the address listed on this stationary.

ABLE COPY

Thank you for your time and attention.

Very truly yours,

Yvonne Liebel

Cc: Michael K. Stanton, Esq.
695 East Main Street
Stamford, CT 06901

Stephen Fogerty, Esq.
Halloran & Sage
315 Post Road West
Westport, CT 06880

Frank J. Silvestre, Jr.
Zeldes, Needle & Cooper
1000 Lafayette Blvd.
Post Office Box 1740
Bridgeport, CT 06601-1740

Attachments:

1. Letter dated August 15, 2001 to contributors and friends of The Alliance Foundation, Inc.
2. Letter from Zeldes, Needle & Cooper of Connecticut;
3. Supreme Court Letters

Attachment 1:

THE ALLIANCE FOUNDATION, INC.

August 15, 2001

Dear Alliance Friend and Contributor,

I hope this letter finds you and yours well.

Since I have written to you last, on December 14, 2000, the struggle to save The Alliance Foundation, Inc., its assets and mission, continued both in and out of the Connecticut courts. I'm writing to you from Washington, D.C. where I have spent the last few days finalizing the filing of an appeal to the United States Supreme Court in a form of a "Petition for Writ of Certiorari" booklet.

Let me briefly update you as to what this means and how we got here.

Following several favorable rulings rendered by the Connecticut Superior Court in Danbury, two of which ordered us to amend our complaint to further include as Defendants: Weil, Gotshal and Manges, LLP; Mark Hoeing, Esq.; David Stone, Esq.; Ridgefield Bank; Bridge To Brotherhood, Inc.; Ira Millstein, Esq.; and Marvin Jacob, Esq.; On October 12, 2000, the Defendants filed an application to the Court to transfer the case to the so-called Complex Litigation Docket in another city (Stamford, Connecticut) where their attorneys are located. We vehemently objected to the transfer citing physical, financial and logistic difficulties that would

seriously compromise our ability to litigate our case in a litigation that was already grossly mismatched.

Note: Neither the UJA nor any other charitable or governmental organization which is directly or indirectly connecte with the Defendants and to this matter are defendants in this actior

The Connecticut Courts ignored our numerous compelling objections via appeals to the Appellate and Supreme Courts and transferred the case. In the process, the Courts violated our due process rights and our right to equal protection of the laws as guaranteed to us under the Fourteenth Amendment of the United States Constitution by not allowing for a hearing at the Danbury Superior Court prior to the transfer; by holding a "staged" and "un meaningful" hearing, after the fact, at the Complex Litigation Docket in Stamford; by transferring our litigation to a Court that deviated from State adjudication standards without providing a "road map" as to what rules and procedures the Complex Litigatio Docket was subjected to, and/or legal assistance, to enable us to appropriately function within its boundaries. Further, toward the end of the nine months appeal process and without legitimate reasons both our part-time attorneys resigned.

Following a couple of months of lone preparation under extreme physical and emotional conditions and without Connecticut counsel, on July 30, 2001, I filed, in pro se, the Petition for "Writ of Certiorari" to the United States Supreme Court on behalf of The Alliance Foundation, Inc., the other Plaintiff corporations connected with this action (Alliance Capital, Inc.; Alliance International Development Corp.; General Homes, Inc.) and myself, appealing the transfer and other Court actions, as well as, questioning the validity of the Complex Litigation Docket and Managerial Judging within this Court/ Docket. The three questions presented before the U.S. Supreme Court in the Petition are:

I Is an Interlocutory Order not-appealable where Due Process is denied a civil litigant?

II Is civil litigant's Due Process not violated when the litigant is denied counsel?

III Does pretrial managerial judging in Complex Litigation Courts violate Due Process when the courts depart from state adjudication standards without a well-publicized body of rules and procedures that is accessible to all litigants?

On August 2, 2001, the Clerk of the United States Supreme Court denied the Petition stating that the 90 days period to file the petition had expired. The U.S. Supreme Court tolled the time from an April 27, 2001 partial Order issued by the Connecticut Supreme Court and not, as stated in the petition, from a complete and final order issued on May 7, 2001(see August 2, 2001 computer generated letter, original is in Connecticut)

On August 3, 2001, I filed a "Motion Directing the Court to File the Petition", contesting the Court's decision, arguing that the April 27, 2001 Connecticut Supreme Court Order was incomplete and could not stand on its own merit. On August 8, 2001, I further filed an Addendum to the Motion asking the distinguished U.S. Supreme Court to review the validity of the Connecticut Supreme Court April 27, 2001 Order, and the wording of its May 7, 2001 Order.

Late in the day on August 8, 2001 and following a review of our motion and addendum, the United States Supreme Court issued a letter accepting the July 30, 2001 filing date and thereby the May 7, 2001 Connecticut Supreme Court Order from which the 90 days tolled. In its letter, the United States Supreme Court requested that I file a new Petition within 60 days of the date of the letter primarily correcting the size of the booklet; removing the names of the other plaintiffs from the cover page (as pro se, I could not represent the

corporations); and requesting that I direct the appeal to the Connecticut Appellate Court vs. the Connecticut Supreme Court (see attached August 8, 2001 letter.) On inquiry during the preparation of the Petition I was told both by outside counsel and the U.S. Supreme Court Clerk that the Connecticut Courts could not be listed as Respondents in this Petition.

On August 13, 2001, a corrected Petition for "Writ of Certiorari" (40 new booklets) was filed and received a docket No. 01-258. According to the U.S Supreme Court Clerk, the Defendants/Respondents will have 30 days to respond to the Petition after which time (could be several months) the U.S Supreme Court will render its decision.

On August 14, 2001, the U.S. Supreme Court issued a formal letter listing the July 30, 2001 as the filing date and placing the petition on the docket as of August 13, 2001 as No. 01-258 (see attached August 14, 2001 letter.)

Now on a more personal note:

While in D.C visiting with a new acquaintance, a doctor, at his practice (he was helpful in carrying and protecting the Petition booklets during a lengthy down pour), I met a Jordanian/Palestinian patient who was there for a physical exam renewing his taxicab's license. Considering the recent horrible suicide bombings in Israel it was hard for me to pursue a conversation with this man (in his early fifties) who first asked for my help in spelling the word "Paramount" on a document he was filling out and later proceeded to ask me where I was from.

Deciding to override my feelings in an attempt to reach out and understand his psyche, I told him that my parents who were born in Baghdad, Iraq, immigrated to Israel when I was a few months old. " Oh, you are a Jew" he exclaimed, seemingly disappointed. I acknowledged.

In a conversation that lasted about 30 minutes, I went on to name some popular Arabic singers to which he was surprised and delighted; I shared with him my visit to Amman Jordan in November 1995 (the Economic Summit) and my appreciation for the late King Hussein's efforts on behalf of peace, to which he had no special reaction, and my sadness for the loss of Prime Minister, Yitzhak Rabin and the peace process, to which he had no special reaction either. I then suggested that if Arabs and Israelis worked together, peacefully, they could build the Middle East to be so successful that it could compete with Europe and the U.S. To that, the man jumped with excitement and said: "Oh, but we could even be better than them..." His reaction was instinctive and genuine.

Although I made special attempt to "win him over" and he called me "my cousin", the conversation was cautious and intense. He then passionately asked why don't the Israelis give up the land for peace to Syria and to the Palestinians like they did with Egypt with which they enjoyed a lasting peace, because otherwise, he said, "Israel would only last-- maybe 20 years", I felt the blood rushing to my head. I then politely asked him how much land did he think the Israelis had to give up in order to secure peace? He intensely suggested that the Israelis should go back to the 1967 borders, prior to the Six Day War. I then asked the man if giving up this land would indeed secure peace between the Israelis and their Palestinian cousins, as he called them? The man replied: " There are no guaranties, of course. You have to trust God. You can't just be scared Israelis" and then he made gestures mimicking "scared" Israelis, " if not in this life maybe in the next life. There's another life after this you know" he said with certainty. Once again, I felt the blood rushing to my head. He smiled at me and affectionately said that I reminded him of a very close relative and then left.

Once he was gone, my heart wept. It wept for the emotional and physical manipulation and abuse of simple folk by fanatic leaders who thrive on chaos and destruction. The lack of constructive and productive leadership in a region that only a few

years ago showed such promise through global political dialogue and budding economic negotiations and partnerships. My heart wept for the confusion and mixed passions... and for lost opportunities. I thought about Mandela, and Gandhi, and Rabin and Saadat, and wondered how much longer does the Middle East have to endure before someone with their stature, vision, courage and charisma would come along to stop this Dance of the Devil and illuminate the way for peoples so lost yet so hungry for and deserving of life, liberty and the pursuit of happiness?

Warmest personal regards from me to you, always.

Yvonne Liebel,

The Alliance Foundation, Inc.
Founder and CEO

P.S. For copies of the Petition for "Writ of Certiorari" booklet, the Motion dated August 3, 2001, and the Addendum dated August 8, 2001, please contact me personally at:

Yvonne Liebel, The Alliance Foundation, Inc.
The Alliance Institute for Peace
106 Great Hill Road
Ridgefield, CT 06877
E-mail: yliebel @ aol.com
Tel: (203) 438-4677 Cell: (310) 435-0769 (you may have to dial 2-3 times)
Fax: (203) 438-0040 or (310) 657-2731

- Any contributions to The Alliance Foundation, Inc. and/or legal assistance will be most welcome.

Attachment 2:

ZELDES, NEEDLE & COOPER
A Professional Corporation

Attorneys at Law
1000 Lafayette Blvd.
Post Office Box 1740
Bridgeport, Connecticut 06601-1740
Telephone (203) 333-9441
Fax (203) 333- 1489

Frank J. Silvestri, Jr.
Direct Mail 203 332-5775
E-Mail fsilvestri@znclaw.com

May 14, 2001

VIA FACSIMILE
AND U.S. MAIL

Ms. Yvonne Liebel
c/o DHA
8913 Olimpic Blvd.
Beverly Hills, CA 90211

Re: Alliance Foundation Inc. et al v. Eugene Grant, et al

Dear Yvonne:

It was a pleasure meeting you last Friday and learning about your case.

I have discussed the matter with Mr. Zeldes and with our screening committee. I am sorry to report that our firm declines to undertake this matter.

We appreciate the fact that you considered retaining us, and wish you the best in the lawsuit and your future endeavors.

Cordially,

Frank J. Silvestri, Jr.

FJS: dbr

Attachment 3:

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 2, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel v. Eugene Grant, et al.

Dear Ms. Liebel:

The above-entitled petition for writ of certiorari hand-delivered on July 30, 2001, is herewith returned for the following reason (s):

The petition is out–of-time. The date of the lower court judgment or order denying a timely petition for rehearing was April 27, 2001. Therefore, the petition was due on or before July 26, 2001. Rules 13.1, 29.2 and 30.1. When the time to file a petition for a writ of certiorari in a civil case (habeas action included) has expired, the Court no longer has the power to review the petition.

The May 7, 2001, letter from the Supreme Court of Connecticut to you does not toll the time within which to file a petition for writ of certiorari.

Your $300.00 check (#716) is herewith returned.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
(202) 479-3038

Enclosures

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 8, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel v. Eugene Grant, et al.

Dear Ms. Liebel:

Returned are copies of the petition for a writ of certiorari originally received on july 30, 2001, and received again on august 8 2001, which fails to comply with the rules of the Court.

If you intend to pay the $300 docket fee, the petition must b in booklet format and on paper that measures 6 1/8 by 9 ¼ inches. Rule 33.1 (a).

The appendix to the petition as required by rule 14 must be in booklet format and on paper that measures 6 1/8 by 9 ¼ inches. Rule 33.1 (a).

The caption of the case must appear as appropriate in this Court. Rule 34.1 (c).

The additional petitioners listed on the cover of the petition must be removed. The petition should be directed to the Appellate Court of Connecticut.

The text of the petition and appendix must be typeset Roman 11-point or larger type with 2-point or more leading between lines. The typeface of footnotes must be 9-point or larger with 2-point or more leading between lines. Please note that computer generated "Roman" font is smaller than traditional Roman type and you may need to increase the font size. Rule 33.1 (b).

Kindly correct the petition and appendix so that it complies in all respects with the Rules of the Court and return it to this office promptly so that it may be docketed. Unless the petition is received by this office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5

Three copies of the corrected petition must be served on opposing counsel. Rule 29.3.

This office shall retain one copy of the petition and your check in the amount of $300.00 in expectation of timely receipt of a properly prepared petition.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
(202) 479-3038

Enclosures

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 14, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel
v. Eugene Grant, et al.
NO. 01-258

Dear Ms. Liebel:

The Petition for a Writ of Certiorari in the above entitled case was filed July 30, 2001 and placed on the docket August 13, 2001 as No. 01-258.

Forms are enclosed for notifying opposing counsel that the case was docketed.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
Assistant

Enclosures

APPENDIX B

A sample Notice:

Grant, Eugene M. VS.
Alliance Foundation CV-01-01B4856-S (xo5)

Notice:

THE HONORABLE CHASE ROGERS< PRESIDING JUDGE OF THE COMPLEX LITIGATION DOCKET AT STAMFORD IS RECUSED FROM THIS CASE. THIS CASE WILL BE REASSIGNED

BY THE CHIEF ADMINISTRATIVE JUDGE OF THE CIVIL DIVISION.

BECAUSE OF RECUSAL BY THE COURT< THE HEARING SCHEDULED FOR SEPTEMBER 12, 2001 IS CANCELLED>

R. RUSH, COURT OFFICER

Kevin W. Ahern
33 Heritage Hill Road

SUPERIOR COURT
123 HOYT STREET
STAMFORD, CONNECTICUT 06905 Branford CT 06405

DATED: SEP 05, 2001
FST

APPENDIX C

A Sample Notice:

JUDICIAL INFORMATION SYSTEMS REPORT DATE 9/20/2001
COUNSEL/PRO SE NOTIFICATION REPORT PAGE 01 OF 01

PLAINTIFF- ATTORNEYS AND PRO SE PARTIES

YVONNE LIEBEL
54 DANBURY RD. SUITE 300
RIDGEFIELD, CT 06877

JOYCE A. MORIN
559 RTE 6
P.O.BOX 110
MAHOPAC, NY 10541

DEFENDANT-ATTORNEYS AND PRO SE PARTIES

ROBINSON & COLE
FINANCIAL CENTRE
PO BOX 10305
STAMFORD CT 06904

RUCCI BURNHAM CARTA & ED
800 POST ROAD
PO BOX 1107 DARIEN CT 06820

LE COPY

CURTIS MALLET-PREVOST C(
FINANCIAL CENTRE
695 EAST MAIN ST
STAMFORD CT 06904

HALLORAN & SAGE
315 POST ROAD WEST
WESTPORT CT 06880

DOCKET NUMBER: CV-01-0183182-S (XO5)
CASE CAPTION: ALLIANCE FOUNDATION E
VS:
GRANT, EUGENE E

THIS CASE HAS BEEN TRANSFERRED TO THE HONORABLE MICHAEL SHELDON OF THE WATERBURY COMPLEX LITIGATION DOCKET FOR ALL FURTHER PROCEEDINGS.

A NEW DOCKET NUMBER WILL BE ASSIGNED BY THE WATERBURY COURT.

THE COURT OFFICER ASSIGNED TO THIS CASE IS BRENDA HAMILTON, ESQ. 203-236-8232

R.RUSH, COURT OFFICER
STAMFORD COMPLEX LITIGATION DOCKET

SUPERIOR COURT
123 HOYT STREET
STAMFORD, CONNECTICUT 06905

DATED: SEP 20, 2001
FST STAMFORD

APPENDIX D

Yvonne Liebel

8913 Olimpic Blvd, Suite 101, Beverly Hills, CA 90211
Tel: (310) 657- 2771 Fax: (310) 657-2731

October 28, 2001

Via Fax: (203) 236-8234 (2 pages)

Brenda M. Hamilton, Court Officer
Superior Court
Complex Litigation Docket
400 Grand Street
Waterbury, CT 06702
Phone: (203) 236-8232

Re: The Alliance Foundation, Inc. et al. v. Eugene Grant, et al
Eugene Grant v. The Alliance Foundation, Inc.
Eugene Grant v. Alliance Capital, Inc.
Eugene Grant v. Alliance Capital, Inc.

Liebel v. Grant et al
United States Supreme Court: Case No.: 01-258

Dear Ms. Hamilton:

Pursuant to your message on my cell phone (310-435-0769) on Tuesday, October 23, 2001 (approx. 2:35 pm West Coast time) and our subsequent conversation on the following day, October 24, 2001, this notice is to confirm that the Initial Status Conference scheduled for October 29, 2001 at 2:15pm at the Waterbury Complex

Litigation Docket at Waterbury is **MARKED OFF** pending United States Supreme Court (Docket No.01-258) decision appealing the Complex Litigation Docket's jurisdiction, anywhere within the State of Connecticut over the above cases and returning them to their original court at the Danbury Superior Court at Danbury.

In addition, one of the issues raised in the Petition for Writ of Certiorari is the absence of Counsel to represent the above cases. Attorney Kevin Ahern listed as legal counsel representing the 3 Grant v. Alliance cases in the documents you faxed me on October 24, 2001 with regard to the conference, resigned earlier this year and his resignation was accepted in July 2001. Attorney Joyce Morin who represented Alliance, et al v. Grant, et al., and DTL-USA and Yvonne Liebel v. Ridgefield Bank, also resigned in June 2001 and her resignation was accepted in July 2001. In July 2001, a notification of their resignation and acceptance of said resignation was sent to: Hon. Judge Tierney at the Complex Litigation Docket in Stamford; the Danbury Superior Court at Danbury; the Appellate/Supreme Court of the State of Connecticut; to all counsel of record and to the United States Supreme Court (as described and evidenced in the Petition).

I would also like to confirm in this notice that it was during our conversation on October 24, 2001, that I first learned about the above cases being transferred from the Stamford Complex Litigation Docket to the Waterbury Complex Litigation Docket five weeks ago (as you know, I was in California since August 26, 2001 due to my father's illness and awaiting the U.S. Supreme Court decision). According to you, the transfer was a result of a conflict-of-interest stemming from the Presiding Judge and one of the Defendants' law firms (you had no knowledge which law firm). I thought, of course, that the conflict had to do with Hon. Judge Tierney who presided over and persisted for the past 11 months on transferring these cases from the Danbury Superior Court to his Court. Upon further inquiry (I called Attorney Kevin Ahern) I learned that Judge Tierney was actually himself transferred to another district (the name of

which was unknown to Ahern as the Court Officer, Rose Anne Rush, did not wish to disclose this information) and the conflict-of-interest had to do with the new presiding Judge, Hon. Chase Rogers, it was therefore that the cases were transferred to Waterbury Complex Litigation Docket.

It is my understanding that in accordance with Connecticut law the above cases are under the jurisdiction of the Danbury Superior Court until such time that the United States Supreme Court decides this matter. Therefore, I do not wish to change my official mailing address as you suggested in your letter. However, I would greatly appreciate if meanwhile you could mail or fax to me any future communications to the California address and fax number listed on this stationary. I will be happy to pay for any additional expenses associated with this matter. For your information, the United States Supreme Court is scheduled to review the Petition for Writ of Certiorari on November 9, 2001.

I thank you in advance for your time and assistance.

Very truly yours,

Yvonne Liebel, pro se
Founder and CEO, The Alliance Foundation, Inc.
President, Alliance Capital, Inc.
President, General Homes, Inc.
President, DTL-USA, Inc.
President, Alliance International Development, Inc.

CC by fax to:
All Counsel of Record
Mr. Frank Lorson, Chief Deputy Clerk, United States Supreme Court (note: I was unable to fax Mr. Lorson)

APPENDIX E

VIA FAX 310- 657-2731

TO: Yvonne Liebel

FROM: Linda Rinaldi
Waterbury Superior Court
400 Grand Street
Waterbury, CT 06702

To confirm our telephone conversation today, I will prepare an expedited transcript of yesterday's hearing in the case of The Alliance Foundation cases. I estimate the transcript to be 30 pages and the cost is $3.50/page for expedited service.

Please fill out and return via fax the form that accompanies this fax transmission. Our fax is 203-236-8198. I will mail the transcript to you via overnight mail.

APPENDIX F

KEVIN W. AHERN

Attorney at Law

33 heritage hill road, Branford, ct, 06405

tel 203 488-4520, fax 203 488-1465, e-mail kwsahe @earthlink.net

October 30, 2001
Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

Re: Grant v. Alliance Capital, Inc.
Grant v. Alliance Capital, Inc.
Grant v. The Alliance Foundation, Inc.

Dear Eva;

My motions to withdraw from the above cases have been granted. The defendants in these cases need to have a new attorney file appearances in these cases immediately. If they do not, the defendants in these cases may not receive notices or copies of pleadings from the Court or opposing counsel. Opposing counsel may also move to default the defendants.

Thank you for your kind attention.

Sincerely,

Kevin W. Ahern

Cc: sent to Fax number 310-657-2731